

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF  
ILLINOIS EASTERN DIVISION**

|                          |   |                                     |
|--------------------------|---|-------------------------------------|
| DEMETRIUS JOHNSON        | ) |                                     |
|                          | ) | Case No. 20 CV 4156                 |
| Plaintiff,               | ) |                                     |
|                          | ) | Judge Sara L. Ellis                 |
| v.                       | ) |                                     |
|                          | ) | Magistrate Judge Heather K. McShain |
| REYNALDO GUEVARA, et al. | ) |                                     |
|                          | ) |                                     |
| Defendants.              | ) | JURY TRIAL DEMANDED                 |
|                          | ) |                                     |

**DEFENDANT CITY OF CHICAGO’S MOTION FOR SUMMARY JUDGMENT**

Defendant, City of Chicago (the “City”), by and through its undersigned counsel, hereby submit this Motion, contemporaneously with the City of Chicago’s Memorandum in Support of and Local Rule 56.1(a)(3) Statement of Material Facts seeking judgment in its favor as to the claims brought by Plaintiff Demetrius Johnson.

1. This case arises out of Plaintiff’s alleged wrongful convictions for the 1991 murder of Edwin Fred. (Dkt. 1 at ¶ 1).

2. Plaintiff alleges that the City of Chicago is liable, pursuant to *Monell v. New York City Dep’t. of Soc. Servs.*, 436 U.S. 658 (1978), for the violation of Plaintiff’s constitutional rights because Plaintiff’s injuries were directly and proximately caused by the policies, practices, and customs of the City of Chicago, as well as by the actions of policy-making officials for the City of Chicago. (*Id.* at ¶¶ 140-151).

3. For the reasons set forth in the City of Chicago’s Memorandum of Law, the City is entitled to summary judgment on the entirety of Plaintiff’s *Monell* claim.

WHEREFORE, Defendant, City of Chicago, respectfully requests that this Honorable Court grant its Motion for Summary Judgment in its entirety, and for any and all other relief that this Court deems just and proper.

Dated: April 12, 2024

Respectfully Submitted,

/s/ Eileen E. Rosen  
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